

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

LEGACY HOUSING CORPORATION

CIVIL ACTION NO. 2:24-cv-00525-
JDC-DJA

Plaintiff

VERSUS

JUDGE: JAMES D. CAIN, JR.

COUNTRY AIRE MHP LLC, et al

MAGISTRATE JUDGE: DAVID J. AYO

Defendants

**INDIVIDUAL DEFENDANTS' MOTION TO DISMISS
COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

Pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure and Local Rule 7.1(h), defendants Robert Hutson and Eric Wooten (collectively, "Individual Defendants"), respectfully move to dismiss the Complaint filed by Plaintiff Legacy Housing Corporation for lack of personal jurisdiction.¹ The grounds for the relief requested in this Motion are set for in the Individual Defendants' supporting brief, which accompanies this Motion.

Dated: May 28, 2024.

/s/ Eliyahu Ness
Eliyahu "Eli" Ness
NESS PLLC
3232 McKinney Ave., Ste. 500
Dallas, TX 75204
Telephone - (469) 319-1355
eness@nesslegal.com

/s/ Van C. Seneca
Billy E. Loftin, Jr.
Van C. Seneca
Loftin Law Group, LLC.
113 Dr. Michael DeBakey Dr.
Lake Charles, LA 70601
Telephone - (337) 310-4300
Fax - (337) 310-4400
billy@loftinleblanc.com
van@loftinleblanc.com

¹ Defendants William Rodwell and Country Aire MHP, LLC do not join this motion.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on Plaintiff's counsel of record by filing a copy of the foregoing document electronically with the Clerk of Court using the CM/ECF system on May 28, 2024.

By: /s/ Eliyahu Ness
Eliyahu Ness